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Attorneys for Heide Kurtz, Plan Trustee

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**LOS ANGELES DIVISION**

In re

THE WOMAN'S CLUB OF HOLLYWOOD,  
CALIFORNIA,

Debtor.

Case No. 2:12-bk-50767-BR

Chapter 11

**STIPULATION BETWEEN PLAN  
TRUSTEE AND CLAIMANTS SARA VAN  
HORN AND PATRICK VAN HORN FOR  
EXTENSION OF DEADLINE BY WHICH  
OBJECTIONS TO CLAIMS MAY BE  
FILED PURSUANT TO THE TRUSTEE'S  
CHAPTER 11 PLAN OF  
REORGANIZATION**

**[No Hearing Required]**

Heide Kurtz, the Plan Trustee in the case of *The Woman's Club of Hollywood, California* ("Trustee"), and Sara Van Horn and Patrick Van Horn (collectively, "Van Horn"), by their attorneys of record, submit this stipulation to extend the time by which the Trustee may file objections to Van Horn's proof of claim.

**RECITALS**

A. Pursuant to the Trustee's Chapter 11 Plan of Reorganization (Dated April 8, 2014) ("Plan") and the prior court-ordered extensions, the deadline for the Trustee to object to Van Horn's claim is July 31, 2017 ("Objection Deadline").

B. Van Horn filed Claim No. 8-1 on August 5, 2013 ("Van Horn Claim").

1 C. The Trustee and Van Horn have reached an agreement for the treatment of  
2 the Van Horn Claim, and the settlement agreement has been executed by all parties.

3 D. On July 21, 2017, the Trustee filed a motion for an order approving the  
4 agreement [Docket No. 730] ("Compromise Motion"). The deadline to oppose the  
5 Compromise Motion is August 7, 2017. Therefore, the earliest the Compromise Motion  
6 can be approved will be August 8, 2017.

7 E. While approval of the Compromise Motion is pending, the parties would like  
8 to extend the Objection Deadline for an additional 60 days.

9 F. Based on the foregoing, the parties agree to extend the current July 31,  
10 2017, deadline for approximately 60 days to and including September 29, 2017.

11 **STIPULATION**

12 The Trustee and Van Horn hereby stipulate to an extension of the Objection  
13 Deadline with respect to the Van Horn Claim from July 31, 2017, to and including  
14 September 29, 2017 ("Extended Deadline").

15 **IT IS SO STIPULATED.**

16 DATED: July 21, 2017

SMILEY WANG-EKVALL, LLP

18 By: /s/ Lei Lei Wang Ekvall

LEI LEI WANG EKVALL

Attorneys for Heide Kurtz, Plan Trustee

20 DATED: July 21, 2017

HARRIS & RUBLE

22 By: 

DAVID GARRETT

Attorneys for Sara Van Horn and Patrick Van  
Horn

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
**3200 Park Center Drive, Suite 250, Costa Mesa, CA 92626**

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION BETWEEN PLAN TRUSTEE AND CLAIMANTS SARA VAN HORN AND PATRICK VAN HORN FOR EXTENSION OF DEADLINE BY WHICH OBJECTIONS TO CLAIMS MAY BE FILED PURSUANT TO THE TRUSTEE'S CHAPTER 11 PLAN OF REORGANIZATION** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **July 24, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) **July 24, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Hon. Barry Russell  
United States Bankruptcy Court  
255 E. Temple Street, Suite 1660  
Los Angeles, CA 90012

David Garrett  
HARRIS & RUBLE  
4771 Cromwell Avenue  
Los Angeles, CA 90027

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 24, 2017  
Date

Gabriela Gomez-Cruz  
Printed Name

/s/ Gabriela Gomez-Cruz  
Signature

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

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